

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

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TONYA MICHELLE MAHONE, as  
Personal Representative of the Estate of  
GERARD WATSON, Deceased,

Plaintiff,

v.

GARY EDEN and JACQUELINE R.  
FLETCHER,

Defendants.

No. 1:15-cv-01009-PJK-KBM

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**SPECIAL VERDICT FORM**

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On the questions submitted, the jury finds as follows:

**Question 1:** Were any of the following negligent? (Place an "X" in the appropriate space. You are instructed that Gary Eden has conceded negligence, so that question has been answered.)

Gary Eden: Yes   X   No           

Jacqueline Fletcher: Yes   X   No           

**Question 2:** Was the negligence of any defendant a cause of Mr. Watson's death and Plaintiff's injuries and damages?

Gary Eden: Yes   X   No           

Jacqueline Fletcher: Yes   X   No           

If the answer to Question No. 2 is "No" as to both Gary Eden and Jacqueline Fletcher, you are not to answer further questions. Your foreperson must sign this special verdict, which will be your verdict for the defendants and against the plaintiff, and you must

notify the court security officer that you have reached a verdict. Thereafter, you will return to open court.

If the answer to Question No. 2 is "Yes" as to either Gary Eden or Jacqueline Fletcher (or both), you are to answer the remaining questions on this special verdict form. When you have agreed upon each of your answers, your foreperson must sign this special verdict, and you will all return to open court.

**Question 3:** In accordance with the damage instructions given by the court, we find the total amount of damages suffered by plaintiff to be:

\$ 8,214,000 (Here enter the total amount of damages without any reduction for Gerard Watson's negligence, should you so find.)

**Question 4:** Compare the negligence of the following persons and find a percentage for each. The total of the percentages must equal 100% but the percentage for any one or more of the persons named may be zero if you find that such person was not negligent or that any negligence on the part of such person was not a cause of the damages.

Defendant Gary Eden 45 %

Defendant Jacqueline Fletcher 45 %

Gerard Watson 10 %

100 % **100% TOTAL**

The court will multiply the percentage of each individual by the plaintiff's total damages as found by the jury under Question 3. The court will then enter judgment for plaintiff against each defendant in the proportion of damages found as to that defendant.

FOREPERSON